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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Stanley Trojaniak
Maria Trojaniak,

DEBTORS.

Chapter 13

Case No. 16-26168

Hon. Vincent F. Papalia

Oral Argument Not Requested

**NOTICE OF MOTION FOR AN ORDER AUTHORIZING THE
DEBTORS TO ENTER INTO A LOAN MODIFICATION AGREEMENT**

PLEASE TAKE NOTICE that the Debtors Stanley Trojaniak and Maria Trojaniak (the “Debtors”) will move before the Honorable Vincent F. Papalia at the United States Bankruptcy Court, 50 Walnut Street – 3rd Floor, Newark, New Jersey, for an Order authorizing the Debtors to enter into a loan modification agreement concerning the mortgage loan encumbering their residence located at 51 Hadley Avenue, Clifton, New Jersey 07011, and for such other and further relief as this Court deems just and appropriate.

PLEASE TAKE FURTHER NOTICE that any answering papers or objections to the Debtors’ Motion must be filed and served at least seven (7) days before the return date of this motion. If you wish to object to this motion, you must file responding papers stating with particularity the basis of your objection to the motion. All such responsive papers must be filed with the Clerk of the Bankruptcy Court for the District of New Jersey, located at 50 Walnut

Street, Newark, New Jersey, and served simultaneously upon, Christopher J. Balala, as counsel for the Movants, at 1599 Hamburg Turnpike, Wayne, New Jersey 07470; and

PLEASE TAKE FURTHER NOTICE that oral argument is only requested if the motion is contested or so directed by the Court; and

PLEASE TAKE FURTHER NOTICE that this matter does not involve complicated issues of law or fact and therefore no brief is necessary.

Respectfully submitted,

SCURA, WIGFIELD, HEYER,
STEVENS & CAMMAROTA, LLP
Attorneys for Stanley & Maria Trojaniak

Dated: August 11, 2017

By: /s/ Christopher J. Balala
Christopher J. Balala, Esq.